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SOLUTIONS

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24 January 2002
File No. 27325-016

New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
P.O. Box 432
401 East State Street
Trenton, NJ 08625

Attention: Joseph J. Nowak

Subject: Response to NJDEP 20 November 2001 Letter
Hexcel Corporation
Lodi Borough, Bergen County, New Jersey
ISRA Case No. 86009

Dear Mr. Nowak:

On behalf of Hexcel Corporation, this letter provides a response to New Jersey Department of Environmental Protection (NJDEP) letter dated 20 November 2001, and a Remedial Action Schedule as requested by your letter. The referenced NJDEP letter commented on Hexcel's 23 November 1999 Remedial Action Workplan Addendum (RAWA) and Progress Reports dated 13 January and 28 February 2000.

Hexcel acknowledges NJDEP's approval of our revised Remedial Action Workplan, including our general remediation approach comprised of:

- 2-Phase Extraction to remove free-phase product, lower organics to below 1% of solubility, and asymptotic mass recovery conditions.
- 2-Phase Extraction to reduce PCB mobility and source materials by removing NAPLs to which PCBs are associated.
- Limited excavation of PCBs to meet recent PCB guidelines
- Hydrogen Release Compound (HRC™) if necessary, and
- Natural attenuation with engineering/institutional controls to complete the remediation

Hexcel re-affirms its commitment to delineate and remediate all contamination for which it is responsible. Without prejudicing Hexcel's position that there is insufficient data to conclude ultimate responsibility, Hexcel will:

- Remediate the Industrial Sewer including portions on the Napp technologies, Inc. (Napp) property up to Napp's first tie-in, starting with sediment and soil testing for waste classification purposes, and a groundwater and soil stability assessment for excavation purposes.
- Delineate and remediate onto Napp property, if necessary, the surficial PCB contamination recently discovered and remediated on the Hexcel property.

- Investigate the stormwater sewer for potential discharges.
- Sample all wells between Hexcel and Napp to assess potential chlorinated organics and PCB movement onto the Napp property.

We are currently working with Napp Technologies, Inc. (Napp) to obtain access for these purposes. While Hexcel works a resolution with Napp, we will proceed with activities in compliance with the NJDEP requirements on Hexcel property, and as access permission is granted, on neighboring properties.

Hexcel objects to the NJDEP's acceptance to any degree of allegations made by neighboring property owners with insufficient supporting data. This acceptance fails to explain or consider:

- The PCB Aroclor 1242 in Pit J came from Napp, as did the PCBs and other contaminants in MW-E9 and E5 located in the area of Pit J and a drywell and perforated pipe attached to Pit J, as the NJDEP has pointed out to Napp.
- The PCB Aroclor 1242 and LNAPL observed in boring SB-09 came from Napp. This boring is not near the alleged Hexcel discharges, and is surrounded by Napp facilities that have released PCB Aroclors unrelated to Hexcel.
- The widespread distribution of chlorinated organics, including TCE and DCE, on the Napp property includes wells even Napp did not attempt to link to Hexcel, such as MW-E15, MW-E16D, MW-E3, MW-E17D, MW-E11 and MW-E8.
- Contamination in MW-E13, located in the northern corner of Napp's property next to Hexcel is comprised of compounds associated with Napp or previous occupants of Napp property, most significantly on 11/29/98 chlorobenzene at 13,000 ppb and benzene at 4,700 ppb.
- Contamination in MW-E9, a key well next to the industrial sewer and in the area of Pit J and its associated dry well and perforated pipe, is comprised of compounds associated with Napp, most significantly on 6/26/98 benzene (2,200), toluene (69,000), chlorobenzene (4,600), and phenol (16,000), in ppb.

We urge the Agency to refrain from accepting the one sided arguments in a technically complex matter such as this. Below we provide an item-by-item response to the NJDEP's 26 November 2001 letter. A copy of the NJDEP letter is included as Appendix A.

I SOIL COMMENTS

2-Phase Extraction

1. NJDEP has "conditionally" approved the proposal to treat the contaminated soils via 2-Phase Extraction technology and advised that delineation of elevated levels of volatile organic compounds (VOCs) should be completed concurrently with the initiation of remediation. Hexcel respectfully submits that further VOC delineation in soils is unnecessary. We fail to see a reason to alter the approved remediation approach. Hexcel

will conduct post-remediation sampling to evaluate the effectiveness of the remediation (refer to item 4). Furthermore, Hexcel has re-configured the remediation areas to encompass larger area of the site than the area slated for remediation as depicted in Figure 11 of the November 1999 RAWA (AOC-1A through AOC-1F). Figure 1 (attached) shows the re-configured remediation area.

2. Same as Item 1.

3. As stated in item 1 above, the re-configured remediation area is depicted in Figure 1. As requested by the NJDEP, Hexcel is in the process of preparing revised site maps depicting the elevated levels of contaminants with their associated sample depths and the areas of 2-phase system, which address these areas. The remediation area will expand, should it be appropriate to do so, for groundwater contamination.

4. As stated in Item 1 above and as also requested by the NJDEP, Hexcel will prepare a proposal for post-remedial soil sampling based on the areas targeted for 2-phase extraction and existing data.

AOC 6: Remediation of PC

5. NJDEP has raised a concern regarding the elevated levels of PCBs detected in surficial soils. Specifically, NJDEP has required that Hexcel document i) why soil samples for PCB analyses were collected in 1998 and 1999, ii) whether the discharges of PCBs are new or historical in nature, and iii) whether additional PCB surficial sampling is warranted in other areas of the site.

   The initial phase of PCB sampling in 1998 was conducted with the objective of evaluating the extent and concentrations of PCBs in soils for development of remedial options and strategy for the site. There have been no new discharges at the site. Hexcel believes that the detection of surficial PCBs was "new information" rather than "new discharge". The 1998 investigation indicated presence of surficial PCBs in an unpaved area (Boring Location HA-13). The subsequent investigation focussed on delineation of the surficial PCBs in the unpaved area. Additional PCB sampling is not warranted in other areas of the site because PCBs have been adequately delineated in all areas of the site based on the historical data and additional PCB sampling conducted in 1998 and 1999. Hexcel will prepare site maps depicting concentrations of PCBs and the associated sample depths. The issue of delineating off-site PCBs to the most stringent soil cleanup criteria is discussed in Item 6.

6. NJDEP has advised that the proposal to address the elevated surficial PCB contamination is conditionally acceptable provided Hexcel first delineates the PCB contamination prior to remediation. Additionally, NJDEP has advised Hexcel that PCB contamination shall be remediated to the NJDEP residential Direct Contact Soil Cleanup Criteria (RDCSCC) in the off-site direction.

   Hexcel undertook the excavation of impacted surficial soils in July and August 2001 due to the newly discovered potential direct contact health threat and the long delay between the submission of the RAWA and NJDEP's response. Hexcel was confident that there was no risk in proceeding with surficial remediation since the NJDEP was in favor of Hexcel's intent to move forward without RAWA approval during our discussion of the same in the May 1999 meeting. In the off-site direction, the excavation was extended to

the edge of the pavement for Molnar Road. Hexcel will provide the NJDEP with the details of the surficial soil excavation including results for post-excavation sampling in a future submission.

As stated above, Hexcel is working with Napp regarding access to their property. Further delineation of surficial PCBs south of the edge of pavement of Molnar Road will be completed upon acquisition of access permission.

7. Hexcel will provide the requested site maps and boring logs in a future submission.

8. See Item 6.

9. No response required.

AOC 9: Storm Sewer Outfall

10. NJDEP has required that Hexcel submit a proposal to remediate the PCB contaminated sediments at the storm sewer outfall. Hexcel believes that this would be premature and plans to conduct further investigation of the deeper depth sediments where the highest concentrations of PCBs were detected. Hexcel will present the plan in a future submission.

AOC 10: Industrial Sewer Line

11. NJDEP did not approve of Hexcel's proposal to clean out and abandon the existing industrial sewerline. NJDEP has required Hexcel to remove the industrial sewer line from its origin to the point on the adjacent Napp property where Napp ties into the sewerline. As stated earlier, we plan to collect sediment and soil samples for waste classification purposes and for identifying parameters of concern. We also must adequately plan the excavation as the sewer is under water for part of its length, and we will be acquiring the necessary soil data to prepare this plan. We will present a plan to the NJDEP for post-remediation sampling frequency and testing parameters based on the sampling results. Hexcel will work with Napp in order to obtain access to the portion of the industrial sewerline on Napp property to the point where Napp ties into the line.

12. NJDEP's assertion that the industrial sewerline has been an AOC which Hexcel has failed to address is incorrect and without basis. In fact, NJDEP's 31 July 1990 letter directed that Hexcel "abandon the existing sewerline....including cleanup of sediment accumulations" (Item 4 of NJDEP's 31 July 1990 letter). The first two pages of the referenced NJDEP letter are included as Appendix B. In the 1999 RAWA, Hexcel presented a plan to clean out and abandon the sewerline, to which NJDEP has just now responded (Item 11, above). Accordingly any suggestion that Hexcel has been unresponsive, no less in violation of ISRA, is mistaken.

13. Hexcel will submit a map showing the location and extent from origin to discharge point of the entire industrial sewerline and other underground piping at the site in a future submission. Please be advised that we have no more information than you do on the sewerline on Napp property.

Historical and any Newly Identified Areas of Concern

14. NJDEP has required that Hexcel shall review all past and present AOCs (including all pits, trenches, catch basins, stained areas etc.) identified by both Hexcel and the NJDEP, from the initiation of the ISRA Case and submit a discussion on how the 2-Phase system will address the contamination at the AOC. Furthermore, NJDEP has required that the discussion include all AOCs associated with Fine Organics Corp. (F.O.) ISRA Case E97140. Hexcel will present the required discussion and an overlay of historical AOCs with 2-Phase remediation areas, as previously stated (Soil Comment, Item 3). Hexcel will also review the ISRA submissions related to F.O. ISRA Case E97140 and present the required discussion in a future submission.

Steam Tunnel

15. Hexcel fails to understand NJDEP reasoning for correlating the industrial sewer with the steam tunnel. The industrial sewerline and the steam tunnel are two separate entities that served different purposes and were located in dramatically different locations and depths. Napp does not allege any discharges via steam tunnel onto Napp property, and nor is any indicated in Napp's data. The steam tunnel is a concrete structure and no discharge to the environment via the steam tunnel is indicated. Furthermore, there was leakage from Napp to Hexcel via the steam tunnel following the fire and explosion at the Napp facility in 1995. Napp has disregarded Hexcel's continued requests to wall off the tunnel on their property. Appendix C provides a copy of a letter from Hexcel to Napp dated 1 August 1995 requesting that Napp take immediate steps to prevent the seepage via the steam tunnel.

Storm Sewer Line

16. NJDEP has asked that Hexcel address the storm sewerline via collection of soil samples 0-6" below the base at a frequency pursuant to the TRSR, for the entire length from origin to discharge. NJDEP has required that the samples be analyzed for PP+40 minus pesticides. Although Hexcel will conduct sampling along the storm sewerline, as required by the NJDEP, Hexcel believes that the requirement of sampling for PP+40 minus pesticides is unwarranted. We will present a plan to the NJDEP for sampling frequency and testing parameters for the storm sewer based on the sampling results of the sediments and soils for the industrial sewer.

Site Maps

17. As NJDEP has required, Hexcel will submit future site maps with contaminant concentrations and sample depths.

Demolition Debris

18. Hexcel will provide documentation regarding the disposal of PCB contaminated building materials in a future submission.

NJDEP's May 4, 1993 and October 26, 1993 Letters

19. As NJDEP has required, Hexcel will provide an item-by-item response to the above – referenced letters in a future submission.

AOC Designations

20. As NJDEP has required, Hexcel will provide a cross-reference between historic AOCs and current AOCs in a future submission.

Transformer

21. Past attempts, including communications with PSE&G, to obtain information on the referenced transformer, were unsuccessful. Hexcel will re-attempt to obtain information on the transformer and submit available information in a future submission.

II GROUNDWATER COMMENTS

Interim Water Elevation and LNAPL/DNAPL Monitoring and Recovery

1. Hexcel has continued the interim product recovery program and Water Elevation/Product Monitoring Program. Hexcel will submit the monitoring and recovery data collected during the RAWA review period in a future submission.

Horizontal Delineation of VOCs and PCBs

2. As asserted in the beginning of this letter, Hexcel is committed to delineating and remediating the contamination for which it is responsible. Hexcel will continue to work with Napp so an allocation of responsibility can be made based on facts and good science. We will proceed with activities in compliance with NJDEP requirements on Hexcel property, and as access permission is granted, and as developing data may warrant, on neighboring properties.

3. NJDEP has requested a proposal for horizontal delineation of VOC contamination in MW-21. Hexcel intends to fulfill the requirement utilizing hydropunch/temporary well points. We will present a plan for the same in a future submission.

4. Hexcel will conduct required groundwater sampling for MW-32B, CW-1, CW-2, and CW-3 to evaluate whether horizontal delineation is required.

5. As stated earlier, Hexcel is working with Napp to resolve access issues.

Vertical Delineation of VOCs and Investigation of Silt Layer in the area of MW-26 (Hexcel's AOC-4)

6. No response required. NJDEP has approved Hexcel's proposal for the investigation of Building 2.

7. No response required. NJDEP advised that active remediation in the Building 2 required based on the concentrations of VOS detected in MW-26, RW6-1, RW6-2 and RW6-3.

Delineation of DNAPL Beneath Saddle River

8. No response required. NJDEP approved Hexcel's proposal for no further investigation of groundwater quality across the Saddle River from the Hexcel site.

Bedrock Investigation Near MW-1 (Hexcel's AOC-7)

9. No response required. NJDEP approved Hexcel's proposal to install a bedrock well near MW-1 after the remediation of shallow overburden in this area.

BNAs and PPMs in Groundwater and Soil (Includes Hexcel's AOC-3)

10. No response required. NJDEP has approved Hexcel's proposal to sample MW-8, MW-10, MW-14, MW-28, CW-11 and CW-12 for BNAs and PPMs to determine the need for sampling Saddle River for these parameters.

11. NJDEP advised Hexcel that it will accept Hexcel's BNA sampling proposal as long as Hexcel believes that the proposed remedial actions will remove BNA source materials at the site and post-remedial groundwater sampling is conducted for BNAs. We believe that 2-Phase Extraction will remove the semi-volatile organic source, if present. Hexcel will proceed with the NJDEP-approved proposal for BNA sampling and provide a plan for post-remedial sampling for BNAs from representative wells at an appropriate time. Any off-site contribution of BNA compounds, specifically Napp's signature compounds such as phenols, will not be included in the post-remedial sampling.

12. Hexcel will provide documentation in support of the metals being related to fill in a future correspondence.

13. No response required. NJDEP approved Hexcel's proposal to sample groundwater for PPMs, and possibly for BNAs, by using EPA's low-flow procedures.

Remediation of NAPL and VOCs in Groundwater and Soil (Hexcel's AOC-1 and AOC-5)

14. Hexcel acknowledges NJDEP's approval of 2-Phase Extraction and possibly HRC to remediate VOC groundwater contamination and its sources. We would like to re-iterate Hexcel's commitment to active remediation for removal of source areas rather than just containment of source material. Furthermore, the installation of sheetpile will provide source containment during active remediation.

15. Figure 1 (attached) provides the re-configured areas of remediation. These include the area of former Building 2 extending to MW-21. These areas will be modified to accommodate new information.

16. Hexcel will evaluate the need to actively remediate other areas based on the horizontal delineation and re-sampling of certain wells. In evaluating whether active remediation is necessary, Hexcel will utilize the remediation goals approved for active remediation, specifically, absence of free product, concentrations of individual VOCs in groundwater are less than 1% of the solubility, and asymptotic mass recovery.

17. Hexcel is working with Napp to obtain access to Napp's property for various purposes, including monitoring of Hexcel and Napp wells on Napp's property. As stated earlier, Hexcel will expand its investigation and remediation into neighboring properties as dictated by facts, good science, and NJDEP requirements.

18. Although Hexcel will provide NJDEP with the requested information, the necessity to rely on field observations regarding decisions for addition or removal of extraction and observation wells during the 2-Phase Extraction, will not allow time for NJDEP's review

and approval. It is imperative that downtime of the 2-Phase Extraction equipment be minimized for efficient and cost-effective remediation.

19. Hexcel will present a plan for product monitoring during active remediation in a future submission.

20. Hexcel will present a product monitoring/recovery plan for the wells along Saddle River in a future submission.

21. See response to Item 19 above.

22. No response required. Hexcel acknowledges NJDEP's acceptance of the remediation goals for 2-Phase Extraction.

23. No response required. Hexcel will present a proposal for establishment of a Classification Exception Area at an appropriate time.

Remediation of PCBs in Soil and Groundwater (Hexcel's AOC-6)

24. Hexcel would like to clarify that the remediation plan proposes to significantly reduce or eliminate the mobility of PCBs to the extent practicable by extracting the mobile LNAPL and DNAPL which is the transport mechanism for PCBs. Furthermore, Hexcel plans to reduce concentrations to the point that limited excavation and institutional/engineering controls can complete the remediation.

25. Hexcel will provide a proposal for post-remedial groundwater samples for PCBs in a future submission.

Saddle River and Surface Water (Hexcel AOC-8 and AOC-9)

26. Hexcel will use the exceedance of the more stringent of the State or Federal Surface Water Quality Standard as a trigger for surface water sampling for BNAs and PPMs.

27. No response required.

Production Well (Hexcel's AOC-11)

28. NJDEP has required that the existing production well be sampled, and that it can be abandoned only if the well is not contaminated. We request that the NJDEP modify this position. The production well is in an area outside of the groundwater contamination source areas, and is affected by regional contamination unrelated to Hexcel. Hexcel requests that NJDEP approve the proposal to abandon the production well as requested in the RAWA. Additionally, Hexcel is concerned about the age and integrity of the well and does not believe it to be an adequate monitoring well.

    Hexcel proposes to install an alternate bedrock well in the area for the purposes of sampling. We will submit a proposal for bedrock well installation, including location and construction detail, in a future submission. We anticipate drilling the bedrock well in this area upon NJDEP's approval of abandonment of the production well and construction of the alternate bedrock well.

III OTHER TECHNICAL REQUIREMENTS

USEPA Rules for PCB Disposal

1. No response required. Hexcel will review the cited rules (Federal Register, 29 June 1998, Volume 63, Number 124) and provide documentation that it complied with the rules.

Baseline Ecological Evaluation

2. No response required. NJDEP has approved Hexcel's proposal to conduct baseline ecological evaluation pursuant to TRSR 7:26E-3.11 and 4.7.

IV GENERAL REQUIREMENTS

1. No response required. Hexcel will submit results or additional workplans in triplicates. This letter is also provided in triplicate.

2. A revised Remedial Action Schedule is provided in the table below.

Estimated Schedule for Remediation

Activity/Application	Estimated Schedule
Submission of RAWA	November 1999
NJDEP's Approval of the RAWA	November 2001 (Letter Received on 11/26/01)
Preliminary Response to 11/26/01 letter	January 2002
Supplemental RAWA with information required in 11/26/01 letter	By 31 May 2002
• Investigation of industrial sewer and storm sewer; • Building 2 Investigation; • Additional Investigation Activities approved and required by the NJDEP including groundwater sampling for B/Ns and metals, surface water sampling, ecological assessment, further groundwater delineation; • Surficial PCB Delineation • Sediment Sampling • Obtain Air and Groundwater Discharge Permits; • Pre-Construction Tasks; • System Design; • Prepare Bid Specifications; • Review Proposals from Contractors; • Procure Equipment	2002
Commence 2-Phase; Excavate Industrial Sewer	Fall 2002
Implement and Continue 2-Phase in additional source areas	3 Years (Fall 2005)
Apply HRC, if appropriate Additional PCB removal, if necessary	2005
Apply Engineering and Institutional Controls including a Classification Exception Area (CEA) and Deed Notice, as required	2005 or 2006

3. No response required.

4. No response required.

5. No response required.

6. No response required.

7. Remediation Funding Source will be increased to $4.7M.

Sincerely yours,
HALEY & ALDRICH, INC.

Sunila Gupta
Project Engineer

Joseph G. Sayarese
Project Manager

John A. Rhodes, P.E.
Vice President

cc: A. William Nosil
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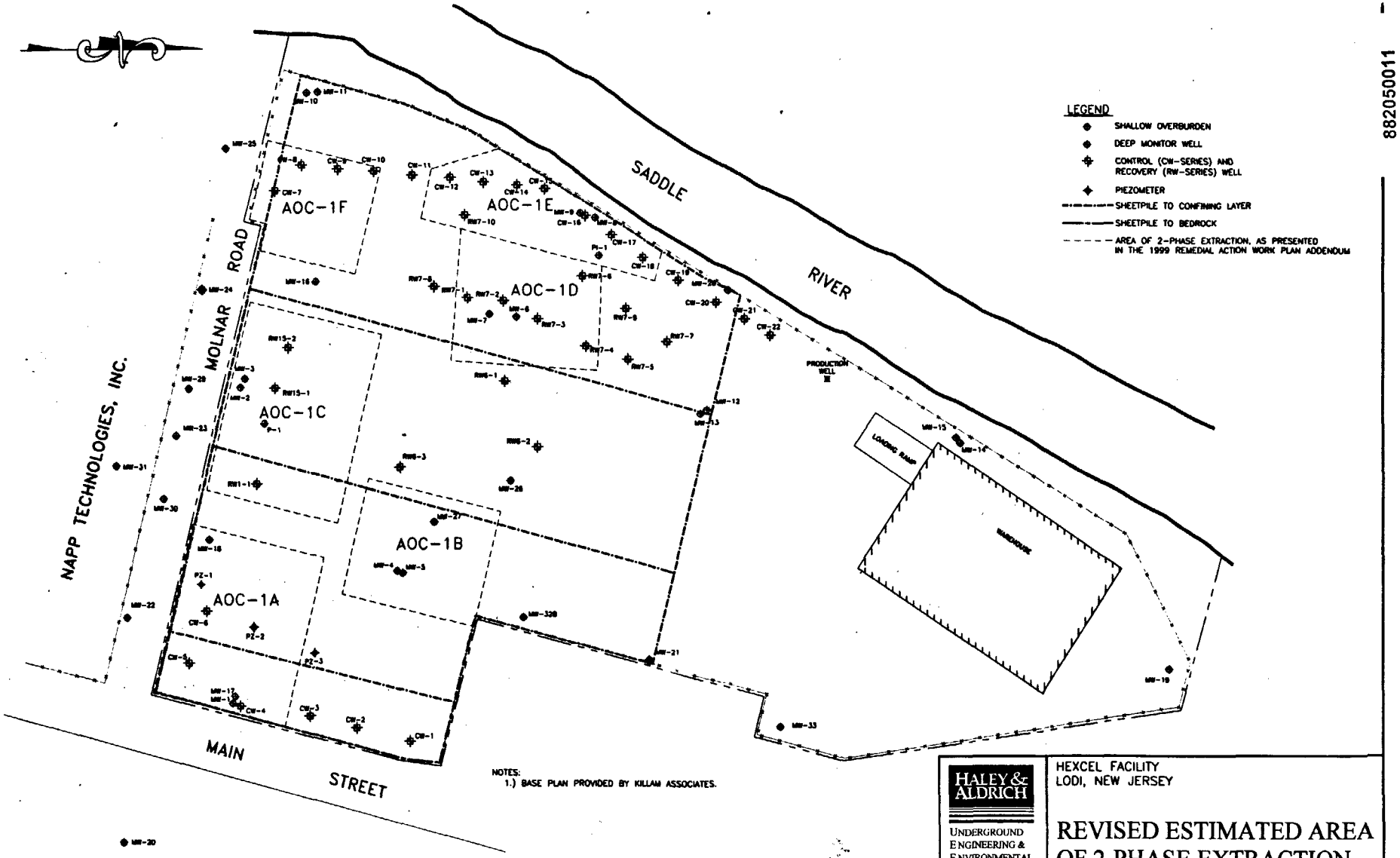

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REVISED ESTIMATED AREA OF 2-PHASE EXTRACTION APPLICATION

SCALE: AS SHOWN

JANUARY 2002

FIGURE 1